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Attorney for Plaintiff Julie Hanna

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

JULIE HANNA,

Plaintiff,

vs.

K-KEL, INC.. a Nevada Corporation; DOES I-X; and, ROE Business Entities I-X, Mark Broadhurst, Mike York, and Chase Swanson.
Defendants.

Case No.: 2:21-cv-00639-JCM-BNW

Stipulation and Order to Extend Deadline for Opposition and Reply to Defendant's Objection to the Magistrate Judge's Order (ECF No. 48)

[First Request]

Pursuant to Local Rule 6-1, Defendant K-Kel, Inc. ("Defendant") and Plaintiff Julie Danou Hanna ("Plaintiff"), by and through their undersigned counsel, hereby stipulate to a fourteen (14) day extension of Plaintiff's deadline to file an Opposition to Defendant's Objection to the Magistrate Judge's Order (ECF No. 48) and Defendant's deadline to file a Reply to Plaintiff's Opposition, as follows:

	Old Deadline	New Deadline
Plaintiff's Opposition Deadline	February 17, 2022	March 3, 2022
Defendant's Reply Deadline	February 24, 2022	March 10, 2022

This is the first request for an extension of these deadlines. The requested extension is sought in good faith and not for purposes of undue delay.

DISCOVERY COMPLETED TO DATE

The parties have exchanged initial disclosures pursuant to FRCP 26(a)(1). Plaintiff has served written discovery upon the Defendant, and Defendant has provided responses. Defendant has served written discovery on Plaintiff and responses are not yet due. Defendant has subpoenaed five sets of medical records. Plaintiff has served an expert witness report and Defendant has identified an expert it would like to use. The parties have agreed that the Plaintiff's responses are due February 28, 2022. Plaintiff has noticed depositions for February 17, 2022.

DISCOVERY REMAINING

The deposition of Plaintiff and other parties, current and former employees of Defendant, experts and potentially other persons, as well as possible further written discovery.

REASON FOR EXTENSION OF DISCOVERY

This extension is necessitated by conflicts in Plaintiff's counsel's schedule making it difficult for Plaintiff to meet her deadline to respond to Defendant's Objection to the Magistrate Judge's Order (ECF No. 48). Defendant's Objection was filed on February 3, 2022. Plaintiff's local counsel, J. P. Kemp, will be out of the office on personal leave from February 7 through February 11, 2022, and will be out of the office taking depositions in another case from February 15 through February 18, 2022. Plaintiff's other counsel, Kathryn Black and Gary Gilbert, will be traveling to Las Vegas, NV and taking depositions in this matter between February 15 and 18, 2022.

Respectfully submitted,

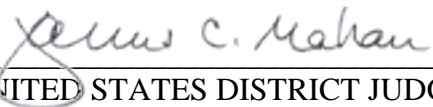
DATED 2/10/2022

/s/ Kathryn Black
Kathryn Black, Esquire
Pro Hac Vice Admission
Attorney for Plaintiff

/s/ Allison Kheel
Allison Kheel, Esquire
Nevada Bar No. 12986
Attorney for Defendant

ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

Dated: March 9, 2022.

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